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8 Attorney for Defendants SEYBERT and
9 ROCKING HORSE PROPERTIES, LLC

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 SECURITIES AND EXCHANGE
10 COMMISSION,

11 Plaintiff,

12 v.

Case No. 2:22-cv-00612

13 MATTHEW WADE BEASLEY; BEASLEY
14 LAW GROUP PC; JEFFREY J. JUDD;
15 CHRISTOPHER R. HUMPHRIES; J&J
16 CONSULTING SERVICES INC., an Alaska
17 Corporation; J&J CONSULTING SERVICE,
18 INC., a Nevada Corporation; J AND J
19 PURCHASING LLC; SHANE M. JAGER;
20 JASON M. JONGEWARD; DENNY
21 SEYBERT; ROLAND TANNER; LARRY
22 JEFFERY; JASON A. JENNE; SETH
23 JOHNSON; CHRISTOPHER M. MADSEN;
24 RICHARD R. MADSEN; MARK A.
25 MURPHY; CAMERON ROHNER; AND
26 WARREN ROSEGREEN;

22 Defendants;

23 THE JUDD IRREVOCABLE TRUST; PAJ
24 CONSULTING INC; BJ HOLDINGS LLC;
25 STIRLING CONSULTING, L.L.C.; CJ
26 INVESTMENTS, LLC; JL2 INVESTMENTS,
27 LLC; ROCKING HORSE PROPERTIES,
28 LLC; TRIPLE THREAT BASKETBALL,
LLC; ACAC LLC; ANTHONY MICHAEL
ALBERTO, JR.; and MONTY CREW LLC;

Relief Defendants.

DEFENDANT DENNY SEYBERT AND
RELIEF DEFENDANT ROCKING
HORSE PROPERTIES' STATEMENT
PURSUANT TO APPOINTMENT
ORDER [ECF. 88]

The Order Appointing Receiver [ECF. 88] was entered on June 3, 2022 (the “Appointment Order”). Defendant Denny Seybert (“Seybert”) and Relief Defendant Rocking Horse Properties, LLC (“Rocking Horse”) object to the requests for information set forth in the Appointment Order to the extent said Order requires waiving any rights protected by the Fifth Amendment to the United States Constitution. Accordingly, this statement is provided by undersigned counsel, but is not a sworn statement by Seybert. In addition to the instant statement, Seybert and Rocking Horse have provided to the Receiver all documents previously provided to the SEC.

Without waiving any objections, and upon information and belief, undersigned counsel for Seybert and Rocking Horse responds to paragraph 9 as follows:

a. The identity, location and estimated value of all Receivership Property.

Asset	Description	Percent Owner	Acquired	FMV
4524 Garden Place	Rental property with rental income	100%	11/6/2015	\$315,000
570 Karen Way	Rental Property with rental income	100%	5/26/2016	\$335,000
331 Tungsten St	Rental property with rental income	100%	1/28/2016	\$325,000
338 Tungsten St	Rental property with rental income	100%	2/3/2015	\$350,000
259 W Basic Rd	Rental property with rental income	100%	4/11/2012	\$336,000
243 W Basic Rd	Rental property with rental income	100%	11/6/2012	\$375,000
1041 N Michael Way #255	Rental property with rental income	100%	8/21/2015	\$227,000
2305 W Horizon Ridge Pkwy #3913	Rental property with rental income	100%	9/30/2003	\$265,000
251 W Basic Rd	Rental property with rental income	100%	5/13/2011	\$250,000
254 W Basic Rd	Rental property with rental income	100%	12/27/2012	\$265,000
247 W Basic Rd	Rental property with rental income	100%	5/2/2002	\$320,000

1	1104 Snow Roof Ave	Rental property with rental income	100%	11/10/2005	\$515,000
2	2176 Skyline Heights Ln	Main family residence	100%	12/19/2018	\$3,000,000
3	12245 Carmel Vista Rd #192, San Diego, CA	Second home, occasionally AIRBNB	100%	4/6/2021	\$750,000
4	1087 W Dixie Lane, Panguitch Lake, UT	Second home, occasional rental	100%	7/6/2018	\$525,000
5	1098 Lake Pointe Dr, Bigfork, MT	Second home, will be occasionally AIRBNB	100%	12/2/2021	\$1,330,000
6	2017 Tesla	Spouse's vehicle. Located in Henderson NV	100%	12/15/2016	\$40,000
7	2020 Chevy Suburban	Personal Vehicle. Located in Henderson NV	100%	7/25/2020	\$45,000
8	2022 Chevy Silverado Pick Up	Personal Vehicle. Located in Bigfork MT	100%	12/18/2021	\$60,000
9	2016 Tige Ski Boat & trailer	Personal leisure boat in Boulder City NV	100%	1/15/2017	\$60,000
10	2007 Lund Boat & trailer	Personal fishing boat in Panguitch UT	100%	7/15/2020	\$12,000
11	2013 Razor ATV & trailer	Personal leisure ATV in Panguitch UT	100%	6/15/2013	\$12,000
12	Rockinghorse Properties LLC	LLC belonging to Denny Seybert for real estate activities.	100%	6/30/1997	
13	C&C Group Holdings LLC	LLC belonging to Denny Seybert and Julie Seybert for family properties.	100%	11/7/2011	
14	JER2911 LLC	LLC that owns and operates a real estate brokerage as an on-going business. 26.5% owner. Silent Investor. Ownership as Rockinghorse Trust.	26.50%	6/1/2012	

Hobbyhorse Associates LLC	LLC that owns and operates a real estate brokerage as an on-going business. 50% owner. Silent Investor. Ownership as Rockinghorse Trust.	50%	10/1/2005	
Southern Nevada Real Estate Services LLC	LLC that owns Vegas Title. A proposed/inactive escrow company. Ownership as Rockinghorse Trust.	50%	9/15/2018	
Buckhead Investments 2018 LLC	LLC that is used for real estate deals. Currently one such property. 50% owner thru spouse; Julie Seybert.	50%	9/15/2018	
Cavalo Holdings LLC	LLC for the holding and management of commercial office space. 50% owner. Silent owner. Ownership as Rockinghorse Trust.	50%	12/15/2013	
Quarter Horse Associates LLC	LLC for the holding and management of 160 acres piece of land in Phoenix area, AZ. Approx 18% owner of LLC. Ownership as Rockinghorse Trust.	18%	6/15/2005	

b. All employees (and job titles thereof), other personnel, attorneys, accountants and any other agents or contractors of the Receivership Defendants.

Seybert and Rocking Horse have been and continue to be represented by undersigned counsel. No others presently known.

c. The names, addresses and amounts of claims of all known creditors of the Receivership Defendants.

This has already been provided to the SEC. Inasmuch as this request seeks personal identifiers and information that may be sensitive or otherwise privileged; same will be provided to the Receiver separately; via email.

Without waiving any objections, and upon information and belief, undersigned counsel for Seybert and Rocking Horse responds to paragraph 10 as follows:

a. All Receivership Property.

See above.

b. Every account at every bank or brokerage or other financial institution.

Financial Institution	Name of Account	Owner	% Owner	Open
Wells Fargo	LV Capital LLC, 50% Coltyn Simmons	Denny D Seybert	50%	1/15/2020
Wells Fargo	Denny D Seybert & Julie Seybert	Denny D Seybert & Julie Seybert	100%	4/15/2012
Bank of America	Denny D Seybert	Denny D Seybert	100%	3/15/1997
Credit Union 1	Denny D Seybert	Denny D Seybert	100%	2/15/1992
Bank of Nevada	Quarter Horse Associates LLC	Denny D Seybert, manager	25%	8/15/2005
Chase Bank	C&C Group Holdings LLC	Denny & Julie Seybert	100%	12/1/2011
Bank of the West	C&C Group Holdings LLC	Denny & Julie Seybert	100%	7/15/2016
US Bank	Denny D Seybert & Julie Seybert	Denny & Julie Seybert	100%	7/15/2015
Wells Fargo	Rockinghorse Properties LLC	Denny D Seybert	100%	6/15/1997

This response will be supplemented as additional information is gathered.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of August, 2022, I served the foregoing
DEFENDANT DENNY SEYBERT AND RELIEF DEFENDANT ROCKING HORSE
PROPERTIES' STATEMENT PURSUANT TO APPOINTMENT ORDER via ECF along
with the following via e-mail as required by paragraph 17 of the Appointment Order:

Tracy S. Combs, Esq.

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Proposed Attorneys for Geoff Winkler, Receiver for J&J Consulting Services, Inc., J&J Consulting Services, Inc., J and J Purchasing LLC, The Judd Irrevocable Trust, and BJ Holdings LLC

/s/ Lance A. Maningo

LANCE A. MANINGO